



**U.S. ENVIRONMENTAL PROTECTION AGENCY CHECKLIST
FOR RISK MANAGEMENT PROGRAM INSPECTIONS OR AUDITS***

At Programs 1 & 2 Stationary Sources

Under Title 40 C.F.R. Part 68 - Chemical Accident Prevention Provisions

*The purpose of the reviews are different, but the information needs are similar.

Instructions. For each question answer by checking Yes (Y), No (N), or Not Applicable (NA). Each question is paraphrased from the regulation and the cite given. For every point of clarification or incident of violation list the evidence supporting it in the comment field. (For example, employee interview and name) . This document is divided into the Subparts and sections of the regulation -40 CFR Part 68. If a section does not apply to the subject source, indicate so and proceed to the next section. Certain sections may be used more than once, depending on the number of processes at the source.

GENERAL FACILITY INFORMATION

1. Facility Name:	
2. Mailing Address (Street, City, State, Zip):	
3. Physical Address or location description (Street, City, State, Zip):	
4. Latitude: Longitude: Where Taken:	
5. County:	
6. RMP Number: FRS Number	
7. Facility Contact:	
8. Facility Contact Phone No.	
9. Facility Contact E-mail:	
10. Website (optional):	
11. List and Describe <u>all</u> Covered Processes and indicate which are being inspected/audited:	

§68 - SUBPART A – GENERAL				
§68.10 - Applicability				
Parameters	Y	N	NA	Comment
§68.10(a) – Is the facility a stationary source with more than a threshold quantity of a regulated substance in a process per §68.115?				Current RMP lists
§68.10(b)(1) – The facility <u>has NOT</u> had a release in the last 5 years with <u>off-site</u> exposure?				
§68.10(b)(2) – Is the endpoint distance for a worst-case release <u>less than</u> the distance to a public receptor?				
§68.10(b)(3) – Have emergency response procedures been <u>coordinated</u> with local planning and response organizations?				Verified with LEPC/FD contact (name):
§68.10(d)(1) - Does the facility have a listed NAICS code(s)?				Code list on RMP is
§68.10(d)(2) - Is facility subject to OSHA PSM?				

What is the program level for this process?	Program 1 Yes to §68.10(b)(3)	Program 2 neither Program 1 or Program 3	Program 3 Yes to either of §68.10(d)(1 or 2)

Note: If the processes is Program 3, STOP and complete the Program 3 checklist!

The following 4 parameters are for PROGRAM 1 facilities. If this facility is a PROGRAM 1 facility, complete this page and go to the signature page. If facility is PROGRAM 2 go to the next page.

§68 - SUBPART A - General				
Parameters	Y	N	NA	Comment
§68.12 - General Requirements (for Program 1)				
§68.12(b)(1) - Has the facility analyzed the worst-case scenario for each P1 process as provided in §68.25(a)(1)?				
§68.12(b)(2) - Has the facility had an accident in the last 5 years and completed its 5-year accident history? All accidents occurring after 4/9/2004 must be included in the accident history within 6 months of the accident.				Check "OSHA 300 Log"
§68.12(b)(3) – Have emergency actions been <u>coordinated</u> with local planning and response organizations?				Verified with LEPC/FD contact (name):
§68.12(b)(4) - Has the facility <u>certified</u> correctly in the RMP that the worst-case endpoint distance is less than the distance to the nearest public receptor?				

§68 - SUBPART B - HAZARD ASSESSMENT (Program 2)				
Parameters	Y	N	NA	Comment
§68.22 - Were the <u>parameters</u> for off-site consequence analysis followed?				
§68.25 - Has the facility analyzed the worst-case scenario for each Program 2 process showing the <u>greatest distance</u> ?				
§68.28 - Has the facility prepared <u>at least one</u> alternative release scenario for each regulated <u>toxic</u> substance held in a covered process?				
§68.28 - Has the facility prepared <u>at least one</u> alternative release scenario for all regulated <u>flammable</u> substances held in a covered process?				
§68.36 - Has the facility reviewed and updated the off-site consequence analysis(es) every five years or after an affective process change?				
§68.39 - Does the facility have the following <u>documentation</u> (records) supporting off-site consequences:				
(a) <u>Worst-case scenario</u> parameters, rationale for selection, and assumptions such as administrative or passive controls and their effects on release quantities or rates?				
(b) <u>Alternative release scenario</u> parameters, rationale for selection, and assumptions such as administrative or passive controls and their effects on release quantities or rates?				
§68.42 - Has the facility included all necessary data for all accidental releases (if any) that resulted in on-site <u>or</u> off-site consequences in its <u>5-year accident history</u> ?				Check "OSHA 300 Log" Check Tier II reports

§68 - SUBPART C - Program 2 Prevention Program				
Parameters	Y	N	NA	Comment
§68.48 Safety Information				
§68.48(a)(1) - Are there up-to-date MSDSs for all regulated substances in the process?				
§68.48(a)(2) - Is there an <u>accurate maximum intended inventory</u> of equipment in which each regulated substance is stored or processed, including all containers?				
§68.48(a)(3) - Are safe upper and lower temperatures, pressures, flows, and compositions established for each process or procedure?				
§68.48(a)(4) - Are process equipment specifications established?				
§68.48(a)(5) - Are the codes and standards used to design, build, and operate the process <u>compiled and maintained</u> ?				
§68.48(b) - Are generally accepted and good engineering practices followed?				
§68.48(c) - Has the safety information been updated, if major changes made it inaccurate?				

§68.50 Hazard Review				
§68.50(a) - Has the facility identified all hazards associated with the process?				Indicate which:
§68.50(b) - Is the process in accordance with all <u>applicable state</u> and <u>federal</u> rules and <u>industry standards</u> for design, fabrication or operation?				
§68.50(c) - Are the results of the hazard review <u>documented</u> and identified problems <u>resolved</u> in a timely manner?				
§68.50(d) - Is the hazard review updated at least every 5 years or after a major change?				

Parameters	Y	N	NA	Comment
§68.52 Operating Procedures				
§68.52(a) - Are there written operating procedures for each covered process, including those involving contractors?				
§68.52(a) - Do these procedures provide <u>clear instructions</u> or steps for safely conducting activities in the covered process?				
§68.52(b) - Do the procedures include:				
(1) Initial startup,				
(2) Normal operations,				
(3) Temporary operations,				
(4) Emergency shutdown and operation,				
(5) Normal shutdown,				
(6) Startup following a shutdown or major change,				
(7) <u>Consequences of deviation</u> and steps to avoid deviation,				
(8) <u>Equipment inspections</u> ?				
§68.52(c) - Are the operating procedures updated, if/after a major change has occurred?				

§68.54 Training				
§68.54(a) - Has the facility <u>trained</u> or <u>tested competent</u> each employee involved in a covered process?				
§68.54(b) - Has the facility provided refresher training a minimum of <u>every three years</u> for each employee involved in a covered process?				
§68.54(c) - Is each employee involved in a covered process trained in <u>new procedures</u> prior to startup of a process after a major change?				

Parameters	Y	N	NA	Comment
§68.56 Maintenance				
§68.56(a) - Has the facility prepared and implemented procedures for ensuring mechanical integrity?				
§68.56(b) - Are <u>employees involved in maintenance trained</u> for process maintenance activities <u>including the hazards</u> of the process and how to avoid or correct unsafe conditions?				
§68.56(c) - Are <u>contractors</u> trained for maintenance activities?				
§68.56(d) - Are there <u>inspections and testing</u> on process equipment following good engineering practices at a frequency <u>consistent with manufacturer or industry</u> recommendations, codes, or standards and prior experience?				

§68.58 Compliance Audits				
§68.58(a-b) - Has the facility <u>certified</u> that they have evaluated compliance with Subpart C, at least once <u>every three years</u> by at least <u>one person knowledgeable</u> of process?				
§68.58(c-e) - Did the facility document the <u>audit findings, responses, and deficiency corrections</u> and retain the two most recent copies that are less than five years old?				

Parameters	Y	N	NA	Comment
§68.60 Incident Investigation				
§68.60(a-b) - Have incidents resulting in, or with the <u>potential</u> for, catastrophic releases been investigated, within 48 hours following the incident?				
§68.60(c) - Do the investigation findings include the incident <u>description</u> , <u>contributing factors</u> and <u>recommendations</u> ?				
§68.60(d) - Are the investigation findings and recommendation <u>resolved</u> and <u>corrective actions documented</u> ?				
§68.60(e-f) - Are the investigation findings <u>reviewed with affected employees</u> and the summaries retained for five years?				

§68 - SUBPART E - Emergency Response				
Parameters	Y	N	NA	Comment
§68.90 Applicability – Emergency Action Plan				
§68.90(b) – Does the facility rely on the LEPC/FD to respond to accidental releases of the regulated substance(s) and employees of this facility <u>WILL NOT</u> respond?				
§68.90(b)(1) - Does the facility have regulated <u>toxic</u> substances and is it <u>included in the community emergency response plan</u> ?				Verified with LEPC/FD contact (name):
§68.90(b)(2) - Does the facility have regulated <u>flammable</u> substances and has it <u>coordinated</u> response actions with the fire department?				Verified with FD contact (name):
§68.90(b)(3) - Does the facility have appropriate <u>mechanisms</u> in place to notify emergency responders when needed?				

If the response was “YES” to ALL questions in §68.90, “Applicability”, above, indicate NA to all parameters in §68.95, “Emergency Response Program”, below.

§68.95 Emergency Response Program				
§68.95(a) - Does the facility have an <u>emergency response program</u> containing:				
(1) An emergency response plan <u>at</u> the stationary source containing:				
(i) Procedures for <u>notifying</u> the public and responders of a release,				
(ii) Documentation of proper <u>first-aid</u> and emergency medical treatment for accidental human exposures,				
(iii) <u>Procedures</u> and measures for emergency response,				
(2) Procedures for use of <u>ER equipment</u> ,				
(3) Emergency response <u>training</u> for employees,				
(4) <u>Procedures</u> for review and update of the ER plan?				
§68.95(c) - Has the ER plan been <u>coordinated</u> with the community emergency response plan?				Verified with LEPC/FD contact (name):

§68 - SUBPART G – Risk Management Plan				
Parameters	Y	N	NA	Comment
§68.155 – Executive Summary				
§68.155 – Does the Executive Summary address all six (6) required elements?				
(a) Accidental Release Prevention and Emergency Response policies				
(b) Stationary Source and regulated substance(s) handled				
(c) Accidental Release Prevention Program				
(d) 5-Year Accident History				
(e) Emergency Response Program				
(f) Planned changes to improve safety				
§68.160 – Registration				
§68.160(b)(6) & §68.195(b) – Is the emergency contact (name, title, phone number, & e-mail) provided and current? If not, what is the date of the emergency contact change (must be within 1 month of change)?				
§68.160(b)(14) – Was a contractor used to prepare the RMP? If so, was the contractor’s name, mailing address and phone number included in Section 1.8 a-f of the RMP?				
§68.165 – Offsite consequence analysis				
§68.165 – Was the offsite consequence analysis data reported correctly in Sections 2-5 of the RMP?				
§68.168 – Five-year accident history				
§68.168 – Did the five-year accident history include all required accidents and data related to the accidents in Section 6 of the RMP?				

Parameters	Y	N	NA	Comment
§68.170 – Prevention Program/Program 2				
§68.170 – Was the information in Section 8 of the RMP true and accurately reported?				
§68.180 – Emergency response program				
§68.180 – Was the information in Section 9 of the RMP true and accurate?				
§68.190 - Updates				
§68.190 – Was/were update(s) submitted on time?				
§68.190 – Were all 9 Sections of the RMP updated, as required?				
§68.195 – Required corrections				
§68.195(a) – Were there any accident(s) involving injury, death, environmental or significant property damage, offsite evacuation or shelter-in-place after April 9, 2004? If so, has the RMP been updated within 6 months of the accident, in accordance to §68.168, §68.170(j), and §68.175(l)?				

§68 - SUBPART H – Other Requirements				
§68.200 - Recordkeeping				
§68.200 – Have all required records been maintained for 5 years unless otherwise specified?				

SUMMARY QUESTIONS FOR PROGRAM 2

(Note: The information from previous sections is required to answer the following questions.)

§68 - SUBPART A - General				
Parameters	Y	N	NA	Comment
§68.15 Management				
§68.15(a) - Has the facility developed a management <u>system</u> to oversee the implementation of the risk management program elements?				
§68.15(b) - Has the facility assigned a <u>qualified person</u> or position that has overall responsibility for development and implementation of the risk management program elements?				
§68.15(c) - Are RMP implementation responsibilities to other than the qualified person or position <u>clearly documented</u> and lines of authority identified?				
Does facility have a Risk Management Program with <u>all</u> the required elements?				